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U.S. Department of Justice

United States Attorney Southern District of New York

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April 21, 2020

BY ECF

The Honorable Valerie E. Caproni United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

DATE FILED:

MEMO ENDORSED

United States v. Jonathan Burgos et al., 20 Cr. 182 (VEC) Re:

Dear Judge Caproni:

The Government respectfully submits this letter on behalf of all parties to jointly request that the Court adjourn the pretrial conference presently scheduled for April 30, 2020, at 2:30 p.m., to a date and time convenient to the Court on or after July 1, 2020. The parties request this adjournment in light of the advice given by the Centers for Disease Control and Prevention and other public health authorities to take precautions to reduce the possibility of exposure to COVID-19. In addition, while discovery is ongoing, the Government's production of certain discovery materials and the defendants' ability to review discovery produced to date has been hampered by the COVID-19 pandemic.

The Government respectfully requests that time between April 30, 2020 and the rescheduled pretrial conference be excluded pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The Government respectfully submits that the proposed exclusion would be in the interest of justice, particularly in light of uncertainty and unforeseen delays resulting from the ongoing COVID-19 pandemic. The Government understands that defense counsel consent to this request.

Application GRANTED. The April 30 conference is adjourned to July 1, 2020, at **3:00 P.M.** For the reasons stated in the letter, the time between now and the next conference, is excluded for purposes of the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A).

SO ORDERED.

Date: 04/21/2020

HON. VALERIE CAPRONI

UNITED STATES DISTRICT JUDGE

Respectfully submitted,

GEOFFREY S. BERMAN United States Attorney for the Southern District of New York

Assistant United States Attorney

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